

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

YAZMIN GONZALEZ, individually and behalf
of classes of all persons and entities similarly
situated,

Plaintiff,

v.

AMERICAN-AMICABLE LIFE INSURANCE
COMPANY OF TEXAS,

Defendant.

Case No. 1:24-cv-00065-RP

**DEFENDANT AMERICAN-AMICABLE’S UNOPPOSED MOTION
FOR LEAVE TO EXCEED PAGE LIMIT**

Pursuant to Local Rule 7, Defendant American-Amicable Life Insurance Company of Texas files this Unopposed Motion for Leave to Exceed Page Limit in connection with its pending Motion for Protective Order to Temporarily Stay or Bifurcate Discovery (Dkt. 16, “Motion for Protective Order”), which seeks entry of a protective order temporarily staying discovery until the Court can decide and rule upon Defendant’s pending Motion to Dismiss (*see* Dkt. 11) or, alternatively, entry of an order bifurcating discovery between Plaintiff’s individual and putative class members’ claims. The Motion for Protective Order also requests that the Court either refrain from entering a scheduling order or continue any set discovery-related deadlines until after the Court has ruled on the Motion for Protective Order.

Given the complexity of the facts and legal issues involved in this matter against the Plaintiff, Defendant requests leave of Court to exceed the page limit for its Motion for Protective Order, as set forth in Local Rule 7(c)(2), by approximately ten (10) pages. Defendant also requests leave of Court for Plaintiff to exceed the page limit for any response to the Motion for Protective Order that Plaintiff may file, as set forth in Local Rule 7(d)(2), by approximately ten (10) pages.

The Motion for Protective Order addresses issues requiring full legal briefing due to the complexity of the issues and the number of legal and factual points to be addressed. Detailed briefing will assist the Court in analyzing whether the requested protective order is appropriate and warranted under the circumstances of this case.

For the foregoing reasons, Defendant respectfully asks this Court to grant this Unopposed Motion for Leave to Exceed Page Limit.

Dated: July 12, 2024

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Ryan A. Burgett

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Attorneys for Defendant

CERTIFICATE OF CONFERRAL

I certify that counsel for the parties met and conferred in good faith prior to the filing of the foregoing motion, and were able to reach an agreement on the issues relief sought therein. Therefore, the motion is unopposed.

/s/ Ryan A. Burgett
Ryan A. Burgett

CERTIFICATE OF SERVICE

I certify that on, July 12, 2024, a true and correct copy of the foregoing document was electronically filed with the Court's ECF system to be sent via the electronic notification system to all counsel of record in the above-captioned matter.

/s/ Ryan A. Burgett
Ryan A. Burgett